

24-017-00014



8301 Professional Place, Suite 230
Landover, MD 20785

Mid-Atlantic, LLC

March 28, 2011

Laramie Daniel
Compliance Program
Air and Radiation Management Administration
Maryland Department of the Environment
1800 Washington Blvd
Baltimore, MD 21230-1720

And

Paul Arnold
Office of Enforcement and Permit Review (3AP10)
US EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: GenOn Morgantown and Dickerson Title V Air Operating Permit 2010 Compliance
Certifications

Dear Sir or Madam:

GenOn Mid-Atlantic, LLC respectfully submits the Morgantown and Dickerson Generating Station's
2010 Title V Air Operating Permit Compliance Certifications.

Should you have any questions about these Certifications please feel free to contact me at
arnold.solomon@genon.com or 301 955 9159.

Sincerely,

A handwritten signature in dark ink, appearing to read "Arnold Solomon". The signature is fluid and cursive, with the first name "Arnold" and last name "Solomon" clearly distinguishable.

Arnold Solomon

cc: Ralph Hall, MDE
M. Greger, MDE
S. Lang, MDE

U.S.ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR FEDERAL OPERATING PERMIT,40 CFR PART 71

FORM A-COMP -ANNUAL COMPLIANCE CERTIFICATION

INSTRUCTIONS: There are 3 pages to this form. On this page, complete Sections A and B once with respect to the entire annual compliance certification.

A.GENERAL INFORMATION**1. Identifying Information.**

Source or company name: GenOn Mid-Atlantic, LLC - Morgantown Generating Station

Mailing address: 12620 Crain Highway

City: Newburg State: MD ZIP: 20664

Contact person: Ms. Debra Knight Title: Environmental Analyst

Telephone: (301) 843-4670 Part 70 Permit No: 24-017-00014

2. Reporting Period: The reporting period should be the one-year, or shorter period, required by your part 70 permit. It will be assumed that the beginning date begins and ends at Midnight (12 A.M.), unless you specify otherwise.

Period beginning: 01/01/2010. Period ending: 12/31/2010.

B.CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

1. Responsible Official. Identify the responsible official and provide contact information.

Name: (Last): Gouveia (First): Mark (Middle):

Title: Vice President, PJM South

Street or Post Office Box: GenOn Morgantown Generating Station, 12620 Crain Highway

City: Newburg State: MD ZIP: 20664

Telephone: 202 589 5611 Facsimile: 301 843 4552

2.Certification of Truth, Accuracy and Completeness .The Responsible Official must sign this statement after the form is completed for each applicable requirement.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) 

Name (printed or typed): Mark Gouveia Date: 3, 25, 11

-1-
FORM A-COMP (CONTINUED)

INSTRUCTIONS: Use this page to describe the compliance status of each permit term or condition. This page may be used to provide information on 2 different permit terms or conditions. Copy this page as many times as necessary to cover all permit terms and conditions.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 A. <u>Applicable Standards and limits</u> [COMAR 26.11.09.05A(1)] Visible Emissions not greater than 20 % opacity excluding exceptions <u>Monitoring Requirements</u> [COMAR 26.11.01.10] <u>Recordkeeping Requirements</u> [COMAR 26.11.01.10G(2)] <u>Reporting Requirements</u> [COMAR 26.11.01.10G(1) & (2)]	F-1 and F-2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the opacity standard. The COMS produced continuous data, except as provided in TM90-01. The Continuous Opacity Monitors (COMS) have been certified in accordance with 40 CFR 60 App. B and met the quality assurance criteria of TM 90-01, and continuously monitored opacity except as provided in TM 90-01. Records were maintained to meet the requirements of 26.11.01.10G(2). Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit. With the installation of SO₂ FGDs on Units 1 & 2, COM are reported for By-pass stacks.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 B. <u>Applicable Standards and limits</u> [COMAR 26.11.09.06A(1) & Condition 40, 3/2008 Consent Decree] Control of Particulate matter in excess of 0.10 lbs./MMBTU heat input <u>Testing Requirements</u> [COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> [COMAR 26.11.03.06C] <u>Reporting Requirements</u> [COMAR 26.11.01.04A]	F-1 and F-2	Continuous Compliance

FORM A-COMP (CONTINUED)

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each **monitoring method** or means you must **specify** whether it **produced** intermittent or continuous data.

Testing, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the particulate matter standard. The test method for this determination produces intermittent data. Every 180 day operating period particulate matter tests conducted on April 10 and 11, 2010 and Oct. 10 and 11 2010 for F-1 and April 10 and 11, 2009 for F-2 demonstrate compliance with the particulate matter standard of 0.10 lb/mmBtu [COMAR 26.11.09.06A(1) & Condition 40 3/2008 Consent Decree]. All tests were conducted using EPA Test Method 5 of 40 CFR 60 App. A. Copies of the test reports are filed at the facility. Test reports were submitted within 45 days from test completion.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 C. (1) <u>Applicable Standards and limits</u> [COMAR 26.11.09.07A(1)][Condition-5 3/2008 Consent Decree] Control of SO ₂ : from solid fuel- not > 3.5 lbs./MMBTU From residual oil- not >2.0% sulfur From distillate oil- not >0.3% sulfur <u>Monitoring Requirements</u> [COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> [COMAR 26.11.01.10G(2)] <u>Reporting Requirements</u> [COMAR 26.11.01.10G(2)(d)]	F-1 and F-2	Continuous Compliance Except for as detailed in Section E

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each **monitoring method** or means you must **specify** whether it **produced** intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining Compliance with the SO₂ standard. The CEMS produced continuous data, except as provided in 40 CFR 75. The SO₂ Continuous Emissions Monitors (CEMS) have been certified in accordance with 40 CFR 75 and operated in accordance with 40 CFR75 Subpart B. Records were maintained to meet the requirements of 26.11.01.10G(2) Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit

FORM A-COMP (CONTINUED)

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 C. (2) <u>Applicable Standards and limits</u> HAA -SO ₂ -F1 6108 ton/yr, F2 6066 ton/yr or system wide compliance[COMAR 26.11.27.03C] <u>Monitoring Requirements</u> CEMS[COMAR 26.11.27.05] <u>Recordkeeping Requirements</u> [COMAR 26.11.27.05] <u>Reporting Requirements</u> [COMAR 26.11.27.05]	F-1 and F-2	Continuous Compliance Except for as detailed in Section E

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining Compliance with the SO₂ standards. The CEMS produced continuous data, except as provided in 40 CFR 75. The SO₂ Continuous Emissions Monitors (CEMS) have been certified in accordance with 40 CFR 75 and operated in accordance with 40 CFR75 Subpart B.
 Records were maintained to meet the requirements of 26.11.01.10G(2)
 Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit
 Annual HAA compliance report submitted to MDE, DNR and PSC by 3/1/2010

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 C. (3) <u>Applicable Standards and limits</u> Acid Rain Phase II[40 CFR 72] <u>Monitoring Requirements</u> [40 CFR 72 & 75] <u>Recordkeeping Requirements</u> [40 CFR 72 & 75] <u>Reporting Requirements</u> [40 CFR 72 & 75]	F-1 and F-2	Continuous Compliance Except for as detailed in Section E

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining Compliance with the SO₂ standard. The CEMS produced continuous data, except as provided in 40 CFR 75. The SO₂ Continuous Emissions Monitors (CEMS) have been certified in accordance with 40 CFR 75 and operated in accordance with 40 CFR75 Subpart B.
 Records were maintained to meet the requirements of 26.11.01.10G(2)
 Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 C. (4) <u>Applicable Standards and limits</u> CAIR SO2 allowances caps[40 CFR 96] <u>Monitoring Requirements</u> CEMS.[40 CFR 75] <u>Recordkeeping Requirements</u> 5 Years [40 CFR 96] <u>Reporting Requirements</u> Quarterly EDRs[40 CFR 96]	F-1 and F-2	Continuous Compliance Except for as detailed in Section E

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining Compliance with the SO2 standard. The CEMS produced continuous data, except as provided in 40 CFR 75. The SO2 Continuous Emissions Monitors (CEMS) have been certified in accordance with 40 CFR 75 and operated in accordance with 40 CFR75 Subpart B.
 Records were maintained to meet the requirements of 26.11.01.10G(2)
 Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 D. (1) <u>Applicable Standards and limits</u> [COMAR 26.11.09.08, 26.11.09.08C, 26.11.09.08B(2)(d)] NOx RACT- maximum NOx emissions rate of 0.70 lbs./MMBTU heat input <u>Monitoring Requirements</u> [COMAR 26.11.09.08C(3), 26.11.09.08B(2)(b), 26.11.28.07] <u>Recordkeeping Requirements</u> [COMAR 26.11.03.06C] <u>Reporting Requirements</u> [COMAR 26.11.09.08K(1)]	F-1 and F-2	Continuous Compliance Except for as detailed in Section E

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the NOx RACT standard. The CEMS produced continuous data, except as provided in 40 CFR 75. The NOx Continuous Emissions Monitors (CEMS) have been certified in accordance with 40 CFR 75 App. A and operated in accordance with 40 CFR 75.
 Records were maintained to meet the requirements of 26.11.03.06C
 Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit

FORM A-COMP (CONTINUED)

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<p>Sec.IV 1 D (2). <u>Applicable Standards and limits</u> HAA [26.11.27.03B]Annual NOx Limits F1-2540 tn/year, F2- 2522 tn/year, Ozone NOx Limits F1-1053 tn/year, F2-1048 tn/yr. <u>Monitoring Requirement</u> CEMs 40 CFR 75 [COMAR 26.11.28.09.08C(3)] <u>Recordkeeping Requirements</u> [COMAR 26.11.27] <u>Reporting Requirements</u> Annual and Ozone Report [COMAR 26.11.27.05]</p>	F-1 and F-2	Continuous Compliance Except as noted in Section E

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the HAA. The CEMS produced continuous data, except as provided in 40 CFR 75. The NOx Continuous Emissions Monitors (CEMS) and flow monitor have been certified in accordance with 40 CFR 75 App. A and operated in accordance with 40 CFR 75. NOx emission rate and hourly heat input were determined in accordance with permit conditions.

Records were maintained to meet the requirements of COMAR 26.11.29.11

EDRs were submitted to the NATS Administrator not later than 30 days following each calendar quarter, and reported NOx in lbs./hr. for each hour, and tons for each quarter and the control period. An annual and ozone season compliance report was submitted to MDE, PSC and DNR by 3/01 of each year.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<p>Sec.IV 1b.1 <u>Applicable Standards and limits</u> 0.100 lb/mmBtu 30-day rolling limit and Annual System Wide Compliance 19,650 tn/year, Ozone Season Compliance Limit- 6150 tn/ozs [Condition 53, 57, 58 Potomac River Consent Decree] <u>Monitoring Requirement</u> CEMs 40 CFR 75 [Condition 69 Potomac River Consent Decree] <u>Recordkeeping Requirements</u> [Condition 131 Potomac River Consent Decree] <u>Reporting Requirements</u> Quarterly Reporting [Condition 70 Potomac River Consent Decree]</p>	F-1 and F-2	Continuous Compliance Except as detailed in Section E

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each **monitoring** method or means you must **specify** whether it **produced** intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted with CEMS produced continuous data, except as provided in 40 CFR 75.
The NOx Continuous Emissions Monitors (CEMS) and flow monitor have been certified in accordance with 40 CFR 75 App. A and operated in accordance with 40 CFR 75. NOx emission rate and hourly heat input were determined in accordance with permit conditions.
Records were maintained to meet the requirements of [Condition 131 Potomac River Consent Decree]
[Condition 131 Potomac River Consent Decree]
EDRs were submitted to the NATS Administrator not later than 30 days following each calendar quarter, and reported NOx in lbs./hr. for each hour, and tons for each quarter. 30 day rolling averages were reported to for the control period. An annual and ozone season **compliance report** submitted to MDE, PSC and DNR by 3/1 of each year.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)

Unit ID(s):

Compliance status during
reporting period: 2010

Sec.IV 1b.1 <u>Applicable Standards and limits</u> 7/1/09 to 12/31/09 Compliance with visible emission limits in COMAR 26.11.09.05(2)(2) [Condition-10 3/6/08 Consent Decree] <u>Monitoring Requirement</u> COMs COMAR 26.11.01.11 [Condition-10 3/6/08 Consent Decree] <u>Recordkeeping Requirements</u> COMAR 26.11.01.11 [Condition-10 3/6/08 Consent Decree] <u>Reporting Requirements</u> Quarterly Reporting COMAR 26.11.01.11 [Condition-10 3/6/08 Consent Decree]	F-1 and F-2	Continuous Compliance
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D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each **monitoring** method or means you must **specify** whether it **produced** intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the opacity standard. The COMS produced continuous data, except as provided in TM90-01
The Continuous Opacity Monitors (COMS) have been certified in accordance with 40 CFR 60 App. B and met the quality assurance criteria of TM 90-01, and continuously monitored opacity except as provided in TM 90-01.
Records were maintained to meet the requirements of 26.11.01.10G(2)
Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit. CAM reporting is only when bypass stacks are in operation.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1b.1, Table-1c <u>Applicable Standards and limits</u> Implementation of Interim and Final Compliance Assurance Monitoring [Condition-8 3/6/08 Consent Decree] <u>Monitoring Requirement</u> COMs COMAR 26.11.01.11 [Condition-10 3/6/08 Consent Decree] <u>Recordkeeping Requirements</u> COMAR 26.11.01.11 [Condition-10 3/6/08 Consent Decree] <u>Reporting Requirements</u> Monthly or Quarterly Reporting COMAR 26.11.01.11 [Conditions-10,31 & 32 3/6/08 Consent Decree]	F-1 and F-2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monthly Interim CAM and Quarterly Final CAM summary reports using the COMs were submitted to MDE. Unit 1 & 2 interim CAM plans require reporting at 17% 1-hour average opacity as a indicator range and Monthly reporting The final CAM plans require reporting for Unit 1 19% and overall secondary ESP power level of 319 kW for Unit 2 18% 1-hour average opacity and secondary third field power level of 92 kW indicator range with the monitoring, recordkeeping and reporting found in Table IV-1c. CAM reporting is only when bypass stacks are in operation.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1b.1 <u>Applicable Standards and limits</u> Install PM CEMs [Conditions-31,33 34, 24 & 23, 3/6/08 Consent Decree] <u>Monitoring Requirement</u> PM CEM [Condition-32 3/6/08, Consent Decree] <u>Recordkeeping Requirements</u> 5 year record keeping [Condition-32 3/6/08 Consent Decree] <u>Reporting Requirements</u> Quarterly Reporting of 24 hr rolling averages and notification requirements [Conditions-34, 35, & 36, 3/6/08 Consent Decree]	F-1 and F-2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

GenOn provided MDE with a plan to install PM CEMs on Units 1 & 2 FGD stacks in accordance EPA PS-11. GenOn installed and certified the PM CEMs on Units 1 & 2 and provided MDE with a proposed QA/QC plan. PM CEM 24 hr rolling averages are being reporting as of September 2010. The PM data is now included in quarterly reports to MDE.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1b.1 <u>Applicable Standards and limits</u> Install Mist Eliminator on FGD systems [Condition-44, 3/6/08 Consent Decree] <u>Monitoring Requirement</u> NA <u>Recordkeeping Requirements</u> NA <u>Reporting Requirements</u> [Condition-41, 3/6/08 Consent Decree]	F-1 and F-2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Installed Mist Eliminators in Units 1 & 2 FGD systems and reported such.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1b.1 <u>Applicable Standards and limits</u> Install truck washing facility [Condition-43, 3/6/08 Consent Decree] <u>Monitoring Requirement</u> NA <u>Recordkeeping Requirements</u> NA <u>Reporting Requirements</u> [Condition-41, 3/6/08 Consent Decree]	F-1 and F-2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Installed truckwashing facility and reported such.

FORM A-COMP (CONTINUED)

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 2 A. <u>Applicable Standards and limits</u> [COMAR 26.11.09.05A(1)] Visible Emissions not greater than 20 % opacity excluding exceptions <u>Monitoring Requirements</u> Install hour of operating software[Condition 6 3/6/2008 Consent Decree],[COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> [COMAR 26.11.03.06C] <u>Reporting Requirements</u> [COMAR 26.11.03.06C]	F-CT1, F-CT2, F-CT3, F-CT4, F-CT5, & F-CT6	Continuous Compliance By VEOs

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

<p>Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the opacity standard. The verification of visible emissions specified in the permit produces intermittent data. However, insofar as observations required of the permit satisfy the testing frequency for this parameter, this procedure demonstrates continuous compliance with the opacity standard of COMAR 26.11.09.05A(1)].</p> <p>As stipulated in Sec. IV 3A of the permit, EPA Method 9 observations shall be performed once every 168 hours of operation or at a minimum of once per year. No exceedances of the 20% opacity standard were observed, hence no reporting per Permit Condition 4, Section III was required.</p>

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 2 C. <u>Applicable Standards and limits</u> [COMAR 26.11.09.07A(1)] Control of SO ₂ : from distillate oil- not >0.3% sulfur <u>Monitoring Requirements</u> [COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> [COMAR 26.11.03.06C] <u>Reporting Requirements</u> [COMAR 26.11.01.06C]	F-CT1, F-CT2, F-CT3, F-CT4, F-CT5, & F-CT6	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

<p>Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the SO₂ standard. Fuel sulfur data from each shipment of fuel oil provides intermittent data, however, these data indicate continuous compliance.</p> <p>Fuel supplier certification was obtained demonstrating compliance with the fuel sulfur limitation.</p> <p>Records are retained at the facility for the required five years.</p> <p>Fuel certification was provided to the MDE inspector as requested.</p>
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C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 2.1C. <u>Applicable Standards and limits</u> [COMAR 26.11.09.08G] NOx RACT- provide certification to Department of capacity factors, as defined in 40 CFR 72.2, to be <15%; record hours of operation. <u>Testing Requirements</u> [COMAR 26.11.09.08G(1)(b)] <u>Recordkeeping Requirements</u> [COMAR 26.11.09.08G(1)(c), 26.11.03.06C] <u>Reporting Requirements</u> [COMAR 26.11.09.08G(1)(a), 26.11.03.06C]	F-CT1, F-CT2, F-CT3, F-CT4, F-CT5, & F-CT6	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Testing, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the NOx RACT standard.
 Capacity Factors for 2010 were as follows: FCT1 – 0.87%; FCT2 – 0.78%; FCT3 – 1.07%; FCT4 -1.20%; FCT5 - 0.69%; and FCT6 – 1.06%.
 Hours of operation for 2010 were as follows: FCT1 – 108; FCT2 – 98; FCT3 – 158; FCT4 – 163; FCT5 – 125; and FCT6 – 158.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 2.1.C & CAIR Permit <u>Applicable Standards and limits</u> Hold NOx allowances sufficient to cover NOx emissions during Annual & Ozone Season [40 CFR 96]. <u>Monitoring Requirements</u> [40 CFR 75 Subpart B and App. C] <u>Recordkeeping Requirements</u> [40 CFR 96 Subpart HH & HHHH] <u>Reporting Requirements</u> [40 CFR 75 Subpart G]	F-CT3, F-CT4, F-CT5, & F-CT6	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the CAIR NOx Program. NOx emission rate and hourly heat input were determined in accordance 40CFR96 (FCT3-6).
 Records were maintained to meet the requirements of 40 CFR 96 Subpart HH & HHHH
 EDRs were submitted to the NATS Administrator not later than 30 days following each calendar quarter, and reported NOx in lbs./hr. for each hour, and tons for each quarter and the control period. An annual compliance certification was submitted to MDE & EPA prior to the allowance transfer deadline.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 3.1 A. <u>Applicable Standards and limits</u> [COMAR 26.11.09.05A(1)] Visible Emissions not greater than 20 % opacity excluding exceptions <u>Monitoring Requirements</u> [COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> [COMAR 26.11.03.06C] <u>Reporting Requirements</u> [COMAR 26.11.03.06C]	F-AUX1, F-AUX3, & F-AUX4	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the opacity standard. The verification of visible emissions specified in the permit produces intermittent data. However, insofar as observations required of the permit satisfy the testing frequency for this parameter, this procedure demonstrates continuous compliance with the opacity standard of COMAR 26.11.09.05A(1)].

Auxiliary Boilers F-AUX1, and F-AUX3 did not operate during the reporting period for this certification. F-AUX2 operated a total of 652 hours and F-AUX4 operated a total of 352 hours during the reporting period. As stipulated in Sec. IV 3A of the permit, EPA Method 9 observations shall be performed once every 168 hours of operation or at a minimum of once per year. No exceedances of the 20% opacity standard were observed, hence no reporting per Permit Condition 4, Section III was required.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 3.1 C. <u>Applicable Standards and limits</u> [COMAR 26.11.09.07A(1)] Control of SO ₂ : from distillate oil- not >0.3% sulfur <u>Monitoring Requirements</u> [COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> [COMAR 26.11.03.06C] <u>Reporting Requirements</u> [COMAR 26.11.01.06C]	F-AUX1, F-AUX3, & F-AUX4	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining Compliance with the SO₂ standard. Fuel sulfur data from each shipment of fuel oil provides intermittent data, however, these data indicate continuous compliance.

Fuel supplier certification was obtained demonstrating compliance with the fuel sulfur limitation. Records are retained at the facility for the required five years.

Fuel certification was provided to the MDE inspector as requested.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 3.1 C. <u>Applicable Standards and limits</u> [COMAR 26.11.09.08G] NOx RACT- provide certification to Department of capacity factors, as defined in 40 CFR 72.2, to be <15%. <u>Testing Requirements</u> [COMAR 26.11.09.08G(1)(b)] <u>Recordkeeping Requirements</u> [COMAR 26.11.09.08G(1)(c), 26.11.03.06C] <u>Reporting Requirements</u> [COMAR 26.11.09.08G(1)(a), 26.11.03.06C]	F-AUX1, F-AUX3, & F-AUX4	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Testing, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the NOx RACT standard.
 Auxiliary Boilers F-AUX1 and F-AUX3 did not operate during the reporting period for this certification.
 F-AUX2 operated a total of 479 hours and F-AUX4 operated a total of 43 hours during the reporting period.
 Capacity factor, as required by 40 CFR 72.2, is an annual determination. Calculation of the capacity factor for the reporting period is as follows: AUX2 = 4.0% and AUX4 = 0.15%
 If AUX2 operated > 500 hours during the reporting period of this certification would then require a combustion analysis/optimization test was required and performed during the reporting period. AUX2 is equipped with a digital control system that continuously maintains proper air/fuel ratios.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 4.1 A & B <u>Applicable Standards and limits</u> 20% Opacity Standard [COMAR 26.22.09.05 (1) & (3)& NSPS Subpart Db] <u>Monitoring Requirements</u> EPA Method 9 VEO[COMAR 26.11.03.06C]] <u>Recordkeeping Requirements</u> 5 years [COMAR 26.11.03.06C] <u>Reporting Requirement</u> Report exceedences under Condition 4 Section III, Plant Wide Conditions	Aux-2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the opacity standard. The verification of visible emissions specified in the permit produces intermittent data. However, insofar as observations required of the permit satisfy the testing frequency for this parameter, this procedure demonstrates continuous compliance with the opacity standard of COMAR 26.11.09.05A(1)]. F-AUX2 operated a total of 479 hours and F-AUX4 operated a total of 43 hours during the reporting period. As stipulated in Sec. IV 4.3A of the permit, EPA Method 9 observations shall be performed once every 168 hours of operation or at a minimum of once per year. No exceedances of the 20% opacity standard were observed, hence no reporting per Permit Condition 4, Section III was required.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 4.1 B, & E <u>Applicable Standards and limits</u> PM10 -0.10 lb/mmBtu & 15 tons/yr [40 CFR 60.43b, CPCN Case 8949 Condition IV-1] <u>Monitoring Requirements</u> Initial EPA Stack Test and no other monitoring required if oil sulfur content below 0.3%[40 CFR 60.48b] <u>Recordkeeping Requirements</u> 5 years [COMAR 26.11.03.06C] <u>Reporting Requirement</u> NA	Aux-2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Aux -2 burned #2 oil with a sulfur content less than 0.3%. as required under COMAR 26.11.09.07A(1) as shown in Section IV 4.1C

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 4.1C <u>Applicable Standards and limits</u> 0.30 % sulfur content oil, 0.50 lb/mmBtu & 40 tons/yr [COMAR 26.11.09.07A(1), 40 CFR 60.42b, CPCN Case 8949 Condition IV-1] <u>Monitoring Requirements</u> [40 CFR 60.48b, COMAR 26.11.09.07C] <u>Recordkeeping Requirements</u> 5 years [COMAR 26.11.03.06C] <u>Reporting Requirement</u> NA	Aux-2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Aux-2 burned #2 oil with a sulfur content less than 0.3%, as required under COMAR 26.11.09.07A(1). The annual fuel supplier's certification of low sulfur distillate oil maintained onsite.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 4.1 B, & E <u>Applicable Standards and limits</u> NOx 0.30 lb/mmBtu – 27 tons/year and capacity factor less than 10% [COMAR 26.11.09.08G, 40 CFR 60.44b} <u>Monitoring Requirements</u> Operating Hours and Capacity Factor [COMAR 26.11.03.06C 40 CFR 60.44b (j) & (k), Combustion Analysis, <u>Recordkeeping Requirements</u> 5 years [COMAR 26.11.03.06C] <u>Reporting Requirement</u> Annual Capacity Factor on emission statements	Aux-2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Aux 2 operated for 479 hours and had a capacity factor of 3.97% for 2010 and only combusted distillate oil.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 4.1 E <u>Applicable Standards and limits</u> 182,458 mmBtu annual heat input <u>Monitoring Requirements</u> Fuel use and heat content [COMAR 26.11.03.06C 40 CFR 60.44b (j) & (k) <u>Recordkeeping Requirements</u> 5 years [COMAR 26.11.03.06C], 2 years 40 CFR 60.49b(o) <u>Reporting Requirement</u> Annual Heat Input in emission statement.	Aux-2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each **monitoring method** or **means** you must specify whether it **produced** intermittent or continuous data.

Aux 2 heat input reported in annual emission statement.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)

Unit ID(s):

Compliance status during
reporting period: 2010

<p>Sec.IV 5.1</p> <p>Applicable Standards and limits Visible Emission 20% opacity [40 CFR 60 252(c), CPCN 9031 Condition 10]</p> <p>Monitoring Requirements NSPS VEO Performance Test by EPA & MDE methods, monthly BMP inspections [CPCN 9031 Conditions 14 & 15]</p> <p>Recordkeeping Requirements Records of BMP Inspections and Maintenance for 5 year [CPCN 9031 Conditions 18][COMAR 26.11.03.06C(5)(g)]</p> <p>Reporting Requirement NSPS Test Results submitted to EPA & MDE[CPCN 9031, Condition 22]</p>	<p>Barge Unloader</p>	<p>Continuous Compliance</p>
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D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each **monitoring method** or **means** you must specify whether it **produced** intermittent or continuous data.

Monthly BMP Conducted, NSPS VEOs conducted in 2009 and results submitted to EPA and MDE.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)

Unit ID(s):

Compliance status during
reporting period: 2010

<p>Sec.IV 5.1</p> <p>Applicable Standards and limits Control of Particulate Matter from Material Handling [COMAR 26.11.06.03D, CPCN 9031 Condition 9c]</p> <p>Monitoring Requirements Shall maintain and operate Develop BMP inspections [CPCN 9031 Conditions 12a]</p> <p>Recordkeeping Requirements Records of BMP Inspections and Maintenance for 5 year [CPCN 9031 Conditions 16,17&20][COMAR 26.11.03.06C(5)(g)]</p> <p>Reporting Requirements Monthly BMP available upon request [CPCN Condition 12, COMAR 26.11.06.06C]</p>	<p>Barge Unloader</p>	<p>Continuous Compliance</p>
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D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Material Handling BMPs Developed and Monthly BMP conducted.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)

Unit ID(s):

Compliance status during
reporting period: 2010

Sec.IV 6.1 <u>Applicable Standards and limits</u> 20% Opacity [COMAR 26.11.06.02C,] <u>Monitoring Requirements</u> VEOs [COMAR 26.11.03.06C]] <u>Recordkeeping Requirements</u> 5 Year [COMAR 26.11.03.06C]] <u>Reporting Requirements</u>	Coal Blending Facility TP 1,2,3,4,&5	NA
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D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Facility no longer in operation

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<p>Sec.IV 6.1A</p> <p><u>Applicable Standards and limits</u> Control of Particulate Matter from Material Handling [COMAR 26.11.06.03D]</p> <p><u>Monitoring Requirements</u> Shall maintain and operate Develop BMP inspections [COMAR 26.11.03.06C]</p> <p><u>Recordkeeping Requirements</u> Records of BMP Inspections and Maintenance for 5 year and report thru-put and hours of operation[COMAR 26.11.03.06C]</p> <p><u>Reporting Requirements</u> Thru put and hours of operation report on emission certs. [COMAR 26.11.03.06C]</p>	<p>Coal Blending Facility TP 1,2,3,4,&5</p>	<p>NA</p>

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Facility no longer in operation

FORM A-COMP (CONTINUED)

Section VI STATE ONLY ENFORCEABLE CONDITIONS

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec VI Table IV 1.1 <u>Applicable Standards and limits</u> Install SCR on F1 and F2, PM emissions will not increase above baseline and NH3 slip emission shall not exceed 3 ppm [4/26/2006 MDE/Mirant Agreement] <u>Monitoring Requirements</u> NOx CEMs [COMAR 26.11.01.11, 4/26/2006 MDE/Mirant Agreement] <u>Recordkeeping Requirements</u> NA <u>Reporting Requirements</u> Submittal of Stack Test protocol and result[4/26/2006 MDE/Mirant Agreement]	F1 and F2	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

SCRs on F1 and F2 installed and operating, all PM and NH3 slip stack testing completed and results submitted to MDE in 2007 & 2008.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<u>Applicable Standards and limits</u> Nuisance & Odors[COMAR 26.11.06.08 & 26.11.06.08] <u>Monitoring Requirements</u> [COMAR 26.11.09.10B] <u>Recordkeeping Requirements</u> [COMAR 26.11.09.10] <u>Reporting Requirements</u> [COMAR 26.11.09.10]	Facility Wide	Continuous Compliance

D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

.Good manage ment practices used to avoid Nuisances or Odors crossing property boundaries.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)

Unit ID(s):

Compliance status during
reporting period: 2010

<p><u>Alternative Operating Scenario for F1 and F2</u></p> <p><u>Applicable Standards and limits</u> [COMAR 26.11.09.10] Requirements to burn used oil and waste combustible fluid as fuel. <u>Monitoring Requirements</u> [COMAR 26.11.09.10B] <u>Recordkeeping Requirements</u> [COMAR 26.11.09.10] <u>Reporting Requirements</u>[COMAR 26.11.09.10]</p>	<p>F1 and F2</p>	<p>Continuous Compliance</p>
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D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring and record-keeping reporting were conducted in accordance with permit conditions for determining compliance with used oil combustion requirements.
54,700 gallons of on spec. oil was burned in 2010.
654,000 gallon of boiler cleaning waste was burned in 2010.
Records are retained at the facility for the required five years.

C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)

Unit ID(s):

Compliance status during
reporting period: 2010

<p><u>Healthy Air Act Requirements- Hg Reductions Requirements</u></p> <p><u>Applicable Standards and limits</u> In 2010 80% Hg reduction 12month rolling average [COMAR 26.11.27.03D] <u>Monitoring Requirements</u> Baseline Hg Stack Testing and Hg CEMs [40 CFR 72, COMAR 26.11.27.04 & .05] <u>Recordkeeping Requirements</u> <u>Reporting Requirements</u> Notification of Hg compliance Option by 1/1/2010, with Annual Report (by 3/1) to MDE, DNR & PSC</p>	<p>F1 and F2</p>	<p>Continuous Compliance</p>
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D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Hg Compliance option provided to MDE. Hg CEMs installed, operating and certified as 40 CFR 75.
Records were maintained to meet the requirements of 26.11.01.10G(2)
Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit
Annual HAA compliance report submitted to MDE, DNR and PSC by 3/1/2010

FORM A-COMP (CONTINUED)

E. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

The table below is appropriate for reporting deviations from permit terms or conditions that have been previously reported in a six-month monitoring report (assuming that the most recent six-month monitoring report and the annual compliance certification both end on the same date). Copy this page as many times as necessary to include all such deviations. Note that you may cross-reference deviations already reported in the six-month report in the first column of the table, and leave the other columns blank, however such cross-reference must be clear and unambiguous with respect to the six-month monitoring report and the individual deviation being cross-referenced. In addition, in the first column, whether you cross-reference deviations or not, you must indicate whether each deviation is a "possible exceptions" to compliance." If a deviation is not a possible exception to compliance, please briefly explain why it is allowed by the permit and cite the relevant permit term that provides the excuse. In addition, if there are deviations that have never been reported in writing to the permitting authority, more information than required by this table will be needed. In such cases, you must include information consistent with Section D of the six-month monitoring report form, and indicate whether it is a "possible exception to compliance."

Permit Term for Which There is a Deviation & Whether the Deviation is a "Possible Exception to Compliance"	Emission Units (unit IDs)	Deviation Time Periods			Written Deviation Report Submittal Date (mo/dy/year)
		Date (mo/day/yr)	Time (hr/min)	Time Zone	
Sec. IV-1C. (1),(2),(3),(4) & 1D (1),(2). Monitoring must meet 40 CFR 75. Regulation requires 12 point stratification test prior to conducting single point sampling. Test contractor used a 3 point stratification test instead of full 12 point test prior to single point sampling.	Units 1 & 2				10/23/2010

**GenOn Mid-Atlantic, LLC - Morgantown Generating Station Title V
2010 CERTIFICATION OF PLANT-WIDE CONDITIONS**

(SECTIONS II & III OF PART 70 **Morgantown Generation Station OPERATING PERMIT**)
Indicate compliance with the following requirements of Sections II & III of your Part 70 Operating Permit in the space provided below:

Section II:

1. Definitions (N/A)

[COMAR 26.11.01.01 & 26.11.02.01-26]

2. Acronyms (N/A)

3. Effective Date (N/A)

4. Permit Expiration

[COMAR 26.11.03.13B(2)]

Received Part 70 Permit on 2/1/2009. Permit is current and active. Permit expiration date - 9/30/2013
Compliance Status: Continuous Compliance

5. Permit Renewal

[COMAR 26.11.03.02B(3) & 26.11.03.02E]

Received Part 70 Permit on 1/27/2009. Permit is current and active.
Compliance Status: Continuous Compliance

6. Confidential Information (N/A)

[COMAR 26.11.02.02G]

7. Permit Actions (N/A)

[COMAR 26.11.03.06E(3) & 26.11.03.20A]

8. Permit Availability

[COMAR 26.11.02.13G]

A copy of the Permit is on-site and available for inspection.
Compliance Status: Continuous Compliance

9. Reopening of the Part 70 Permit for Cause by the EPA

[COMAR 26.11.03.20B]

There has been no action by EPA to reopen the Permit.
Compliance Status: Continuous Compliance

10. Transfer of Permit

[COMAR 26.11.02.02E]

Transfer of the permit has not been requested.
Compliance Status: Continuous Compliance

11. Revision of Part 70 Permits-General Condition (NA)

[COMAR 26.11.03.06A(8) & 26.11.03.14]

No revisions to the existing permit revisions were requested in 2010.
Compliance Status: Continuous Compliance

12. Significant Part 70 Operating Permit Modifications (N/A)

[COMAR 26.11.03.17]

Part 70 Permit Application for a Significant Modifications was submitted to MDE and EPA on 1/21/2010. The submittal included the air operating conditions found in the CPCN for the Morgantown SO₂ FGD system (MD PSC Case 9075) and the Coal Blending and Gypsum Barge Load-Out (MD PSC Case 9148)
Compliance Status: Continuous Compliance

13. Minor Permit Modifications (N/A)

[COMAR 26.11.03.16]

14. Administrative Part 70 Operating Permit Amendments (N/A)

[COMAR 26.11.03.15]

On 12/3/2010 RRI Energy, Inc. and Mirant Corporation completed a merger to form GenOn Energy, Inc. On 12/15/2010 GenOn notified MDE that owner and operator of the Morgantown Generating Station is now GenOn Mid-Atlantic, LLC

15. Off-Permit Changes to this Source (N/A)

[COMAR 26.11.03.19]

16. On-Permit Changes to Sources (N/A)

[COMAR 26.11.03.18]

17. Fee Payment

[COMAR 26.11.02.16A(2)&(5)(b)]

The Morgantown Permit Fee was paid in 2010.
Compliance Status: Continuous Compliance

18. Requirements for Permits to Construct and Approvals

[COMAR 26.11.02.09]

On 3/26/2010 GenOn submitted to the MD PSC a CPCN application to construct a fly ash beneficiation facility (STAR facility) (MD PSC Case 9229). GenOn received the final approval for the CPCN from the MD PSC on 1/29/2011.
Compliance Status: Continuous Compliance

19. Consolidation of Procedures for Public Participation (N/A)

[COMAR 26.11.02.11C & 26.11.03.01K]

20. Property Rights (N/A)

[COMAR 26.11.03.06E(4)]

21. Severability (N/A)

[COMAR 26.11.03.06A(5)]

22. Inspection and Entry

[COMAR 26.11.03.06G(3)]

All Department, Federal and Local personnel have been provided the right of entry and excess to all onsite facilities and activates.
Compliance Status: Continuous Compliance

23. Duty to Provide Information

[COMAR 26.11.03.06E(5)]

GenOn has provided all information required and request by MDE & EPA for Morgantown Station in compliance year 2010.
Compliance Status: Continuous Compliance

24. Compliance Requirement

[COMAR 26.11.03.06E(1), 26.11.03.06A(11) & 26.11.02.05]

Morgantown is compliant with all applicable requirements except for those exceptions noted in Sec. IV E.

Compliance Status: Intermittent Compliance

25. Credible Evidence (N/A)

26. Need to Halt or Reduce Activity Not A Defense (N/A)

[COMAR 26.11.03.06E(2)]

27. Circumvention (N/A)

[COMAR 26.11.01.06]

28. Permit Shield

[COMAR 26.11.03.02]

With expiration of the existing Morgantown Title V Permit, the Permit Shield was in effect until 1/27/2009 when the renewal of the Title V permit became effective.

Compliance Status: Continuous Compliance

Section III:

1. Particulate Matter from Construction and Demolition

[COMAR 26.11.06.03D]

Reasonable precautions were taken during all construction or demolition activity occurred during the reporting period of this certification.

Compliance Status: Continuous Compliance

2. Open Burning

[COMAR 26.11.07.06]

No open burning occurred on site in 2010.

3. Air Pollution Episode (N/A)

[COMAR 26.11.05.04]

4. Report of Excess Emissions and Deviations

[COMAR 26.11.01.07 & COMAR 26.11.03.06C(7)]

Morgantown is compliant with all applicable requirements except for those exceptions noted in Sec. IV E.

All opacity exceedances are reported in CEM reports submitted quarterly to MDE.

Compliance Status: Continuous Compliance

5. Accidental Release Provisions (if applicable)

[COMAR 26.11.03.03B(23) & 40 CFR 68]

Administrative controls have been established which limit the amount of regulated substance on site to below threshold quantities; thus, in accordance with 40 CFR 68.10(a) and 40 CFR 68.115, a Risk

Management Plan is not required for this facility.

Compliance Status: Continuous Compliance

6. General Testing Requirements

[COMAR 26.11.01.04]

Any tests that the Department required in 2010 were performed.

Compliance Status: Continuous Compliance

7. Emissions Test Methods

[COMAR 26.11.01.04]

All emissions tests were conducted in accordance with 40 CFR 60 App. A, 40 CFR 51 App M, and/or TM 91-01.

Compliance Status: Continuous Compliance

8. Emission Certification Report

[COMAR 26.11.02.19C, COMAR 26.11.02.19D, COMAR 26.11.01.05-1]

A 2010 annual emissions certification report was certified, submitted and records maintained.

Compliance Status: Continuous Compliance

9. Compliance Certification Report

[COMAR 26.11.03.06C(6) & (7)]

A 2010 Compliance Certification Report was prepared and is herewith being submitted to MDE and EPA.

Compliance Status: Continuous Compliance

10. Certification by Responsible Official

[COMAR 26.11.02.02F]

A Compliance Certification Report has been signed by the responsible official, Mark Gouveia, Vice President, PJM South.

Compliance Status: Continuous Compliance

11. Sampling and Emissions Testing Record Keeping

[COMAR 26.11.03.06C(5)]

All appropriate records were gathered and retained for compliance demonstration sampling and testing.

Compliance Status: Continuous Compliance

12. General Record Keeping

[COMAR 26.11.03.06C(5)]

Records are being retained for five years.

Compliance Status: Continuous Compliance

13. General Conformity (N/A except for federal facilities)

14. Asbestos Provisions (if applicable)

[40 CFR 61, App. M]

GenOn contracts with WACO to carry out all asbestos removal and disposal.

Compliance Status: Continuous Compliance

15. Ozone Depleting Regulations (if applicable)

[40 CFR 82, App. F]

GenOn contracts with Welsh & Rusch to carry out all CFC maintenance, service repair or disposal.

Compliance Status: Continuous Compliance

16. Acid Rain Permit (if applicable)

[40 CFR 72]

The facility was in compliance with all provisions of the Phase II Acid Rain Permit (Permit No.1572). All compliance certifications and EDRs were submitted to the State and EPA. Allowances were placed in the accounts to cover SO₂ emissions and affected achieve compliance with NO_x emission limit.

Compliance Status: Continuous Compliance